

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

PARSON FINANCE PANAMA S.A.,

Defendant.

Adv. Pro. No. 11-02542 (CGM)

STIPULATION AND ORDER TO AMEND BRIEFING SCHEDULE

WHEREAS, on December 1, 2021, the Court entered an amended stipulation and order that set a briefing schedule for Parson Finance Panama S.A.'s ("Defendant") motion to dismiss the Trustee's Complaint (the "Motion"), Adv. Pro. No. 11-02542 (CGM) (Bankr. S.D.N.Y. Jan. 13, 2021) ECF No. 91;

WHEREAS, on February 18, 2022, Defendant filed the Motion, ECF Nos. 92-95, and on April 19, 2022, the Trustee opposed the Motion, ECF Nos. 96-97;

WHEREAS, the hearing on the motion is scheduled for July 13, 2022, at 10:00 a.m.;

WHEREAS, Defendant has requested an extension of the deadline to file a reply to May 31, 2022, and

WHEREAS, the parties have met and conferred and the Trustee consents to the foregoing request;

IT IS HEREBY STIPULATED AND AGREED by and between the parties, and SO ORDERED by the Court that:

Defendant will submit its reply in further support of the Motion by May 31, 2022.

Dated: May 16, 2022

By: /s/ Matthew D. Feil
BAKER & HOSTETLER LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Matthew D. Feil
Email: mfeil@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Estate
of Bernard L. Madoff*

By: /s/ Douglas A. Kellner
**KELLNER HERLIHY GETTY &
FRIEDMAN LLP**
470 Park Avenue South – 7th Floor
New York, New York 10016
Telephone: (212) 889-2821
Facsimile: (212) 684-6224
Douglas A. Kellner
Email: dak@khgflaw.com
Eugene Getty
Email: efg@khgflaw.com

*Attorneys for Defendant Parson Finance
Panama S.A.*

SO ORDERED:

**Dated: May 20, 2022
Poughkeepsie, New York**



/s/ **Cecelia G. Morris**

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**